

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

FRIENDS OF GEORGE'S, INC.,

Plaintiff,

v.

THE STATE OF TENNESSEE; BILL LEE, in his official and individual capacity as Governor of Tennessee; JONATHAN SKRMETTI, in his official and individual capacity as the Attorney General of Tennessee

Defendants.

Case No. 2:23-cv-02163-TLP-tmp

FRIENDS OF GEORGE'S, INC.,

Plaintiff,

v.

STEVEN J. MULROY, in his official and individual capacity as District Attorney General of Shelby County, Tennessee

Defendant.

Case No. 2:23-cv-02176-TLP-tmp

**DECLARATION OF JAMES R. NEWSOM III IN SUPPORT OF MOTION TO DISMISS
THE STATE OF TENNESSEE, BILL LEE AND JONATHAN SKRMETTI, IN THEIR
OFFICIAL AND INDIVIDUAL CAPACITIES, AND STEVEN MULROY, IN HIS
OFFICIAL CAPACITY**

I, James R. Newsom III, hereby declare as follows:

1. I am an attorney with the Office of the Tennessee Attorney General, counsel of record for Defendants the State of Tennessee, Tennessee Governor Bill Lee, Tennessee Attorney General Jonathan Skrmetti, and Steven Mulroy in his official capacity as District Attorney General of Shelby County, Tennessee (“Defendants”) in the above-captioned actions. I am duly licensed to practice law in the State of Tennessee.
2. I make this declaration in support of Defendants’ Motion to Dismiss the State of Tennessee, Bill Lee and Jonathan Skrmetti, in their official and individual capacities, and Steven Mulroy, in his official capacity (“Motion”), based on my own personal knowledge, and, if called to testify as to the truth of the matters declared herein, I could and would competently testify.
3. Attached as Exhibit A is a true and correct copy of Defendant Shelby County District Attorney Steve Mulroy’s webpage “FAQ: The ‘Drag Show’ Law,” as it appeared on April 6, 2023, available at <https://www.scdag.com/new-blog-1/faq-the-drag-show-law> and published on April 6, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and understanding.

Dated: April 18, 2023

Respectfully submitted,

JONATHAN SKRMETTI
Attorney General and Reporter

s/James R. Newsom III
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in his official and individual capacity as
Governor of Tennessee, Jonathan Skrmetti,
in his official and individual capacity as
Tennessee Attorney General and Reporter,
and Steven J. Mulroy, in his official capacity
as District Attorney General for the Thirtieth
Judicial District of Tennessee*

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing report. Parties may access this filing through the Court's electronic filing system.

s/James R. Newsom III

James R. Newsom III
Special Counsel